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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE  
THE BOARD OF PATENT APPEALS AND INTERFERENCES

Life Application of:

Jeffrey J. Jacobsen, et al.

Serial No. 09/932,505

Filed: August 17, 2001

For: Apparatuses And Methods For  
Flexible Displays

Examiner: T. R. Chowdhury

Art Unit: 2871 ✓

#10

Commissioner for Patents  
Washington, D.C. 20231

**TRANSMITTAL COVER LETTER**

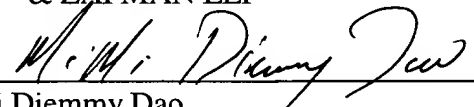
Enclosed for filing in the U.S. Patent and Trademark Office, before the Board of Patent Appeals and Interferences is the Appeal Brief, in triplicate and a check for \$320.00.

If any additional fee is required, please charge Deposit Account No. 02-2666. A duplicate of this transmittal is enclosed for deposit account charging purposes.

Respectfully submitted,

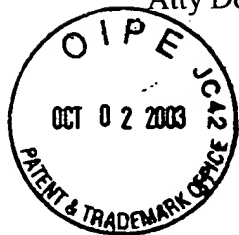
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

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For: <b>Apparatuses And Methods</b>	)	
<b>For Flexible Displays</b>	)	

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

**APPELLANT'S BRIEF UNDER 37 C.F.R. 1.192**

This is an appeal to the Board of Patent Appeals and Interferences from the decision of the Examiner of Group 2871, mailed April 23, 2003, which rejected Claims 1, 4-9, 23-27, 43-52 and 55-62 in the above-identified application. This Appeal Brief is hereby submitted in triplicate pursuant to 37 C.F.R. § 1.192(a).

**A. REAL PARTY IN INTEREST**

The real party in interest is the assignee of the full interest in the invention, Alien Technology Corporation, 18410 Butterfield Blvd., Morgan Hill, CA 95037.

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## **B. RELATED APPEALS AND INTERFERENCES**

To the best of Appellant's knowledge, there are no appeals or interferences related to the present appeal that will directly affect, be directly affected by, or have a bearing on the Board's decision in the instant appeal.

## **C. STATUS OF THE CLAIMS**

Claims 1, 4-9, 23-27, 43-52 and 55-62 are pending in the application and were finally rejected in an Office Action mailed April 23, 2003. Claims 1, 4-9, 23-27, 43-52 and 55 and 57-62 are the subject of this appeal. Please note that claim 56 has been canceled as per the Appeal Brief and the accompanying Amendment filed on January 13, 2003. This Amendment was entered as indicated by the Examiner in his Office Action mailed April 23, 2003. A copy of Claims 1, 4-9, 23-27, 43-52, 55, and 57-62 as they stand on appeal are set forth in Appendix A.

## **D. SUMMARY OF INVENTION**

Appellant's claims are directed to various apparatuses and methods for creating a display.

In one embodiment, a flexible display device is disclosed. The flexible display device in comprises a flexible substrate and an active matrix display backplane coupled to the flexible substrate wherein the active matrix display backplane comprises a plurality of different shaped blocks that are deposited onto the flexible substrate or a polarizing film. See for example, Claim 1, and Application, page 22, lines 9-12.

In another embodiment, the flexible display device in comprises a flexible substrate and a passive matrix display backplane coupled to the flexible substrate wherein the passive matrix display backplane comprises a plurality of different shaped blocks that are deposited onto the flexible substrate. See for example, Claim 23, and Application, page 22, lines 9-12.

In another embodiment, the flexible display device in comprises a flexible substrate and a flexible reflective display coupled to the flexible substrate. See for example, Claim 55, and Application, page 19, line 18 to page 20, line 3.

In one embodiment, the flexible substrate is advanced through a web process apparatus. The plurality of different shaped blocks is deposited onto the flexible substrate wherein the blocks fall into recessed regions in the flexible substrate. See for example, Application, page 16, lines 1-9.

In another embodiment, a flexible continuous substrate is provided upon which multiple flexible display are fabricated. These displays are separated from one another as the flexible substrate is advanced through the web processing apparatus. See for example, Application, page 15, lines 5-12.

## **E. GROUPING OF CLAIMS**

- I. Group I consists of Claims 1 and 4-9 that stand rejected on the grounds that they are unpatentable under 35 U.S.C. § 103(a) over admitted prior art and in view of U.S. Patent 4,514,583 to Izu, et al. (herein after Izu). Claims 1 and 4-9 stand or fall together. Claim 1 is a representative claim for Group I.

- II. Group II consists of Claims 23-27 that stand rejected on the grounds that they are unpatentable under 35 U.S.C. § 103(a) over admitted prior art and in view of Izu. Claims 23-27 stand or fall together. Claim 23 is the representative claim for Group II.
- III. Group III consists of Claims 43, 45, 47, and 52 that stand rejected on the grounds that they are unpatentable under 35 U.S.C. § 103(a) over admitted prior art and in view of Izu. Claims 43, 45, 47, and 52 stand or fall together. Claim 43 is the representative claim for Group III.
- IV. Group IV consists of Claims 44, 46, and 48-51 that stand rejected on the grounds that they are unpatentable under 35 U.S.C. § 103(a) over admitted prior art and in view of Izu. Claims 44, 46, and 48-51 stand or fall together. Claim 44 is the representative claim for Group IV.
- V. Group V consists of Claims 55 and 57-62 that stand rejected on the grounds that they are unpatentable under 35 U.S.C. § 103(a) over admitted prior art and in view of Izu. Claims 55 and 57-62 stand or fall together. Claim 55 is the representative claim for Group V.

#### F. ISSUES

- I. Whether Claims 1 and 4-9 are patentable under 35 U.S.C. § 103(a) over admitted prior art and view of Izu.
- II. Whether Claims 23-27 are patentable under 35 U.S.C. § 103(a) over admitted prior art and view of Izu.
- III. Whether Claims 43, 45, 47, and 52 are patentable under 35 U.S.C. § 103(a) over admitted prior art and view of Izu.

- IV. Whether Claims 44, 46, and 48-51 are patentable under 35 U.S.C. § 103(a) over admitted prior art and view of Izu.
- V. Whether Claims 55 and 57-62 are patentable under 35 U.S.C. § 103(a) over admitted prior art and view of Izu.

### **G. ARGUMENTS**

- I. Claims 1 and 4-9 are patentable under 35 U.S.C. § 103(a) over the admitted prior art and in view of Izu.

The subject matter of Claims 1 and 4-9 differs from the combination of the admitted prior art and Izu at least in that these claims include a plurality of blocks and a flexible substrate whereas the prior art cited does not teach, suggest, or motivate such combination.

Claims 1 and 4-9 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the admitted prior art and in view of Izu. The Examiner stated that the admitted prior art differs from claims 1 and 4-9 in that the substrate is flexible. The Examiner also stated that Izu taught a flexible substrate for the fabrication of thin film electronic devices. The Examiner argued that Izu also disclosed that the use of a thin, continuous, and flexible substrate represents a mean of economizing conventional continuous processing technique and thus cost efficiency favors the continuous deposition of thin film electronic, metallic and semiconductor layers upon a continuous, flexible substrate. The Examiner further argued that Izu is evidence that ordinary workers in the art of liquid crystal would find a reason, suggestion, or motivation to use a flexible substrate.

The reasoning provided by the Examiner does not explain a specific understanding or principle within the art as to the technical reasons why it is beneficial to make the combination of elements recited in claims 1 and 4-9. The reasoning provided does not make a particular finding of fact as to why a person skilled in the art of making a display would be motivated to deposit blocks onto a substrate that is flexible to make a display.

The Examiner bears the burden of proving an obviousness type rejection based on findings of fact and not based on conclusive statements. The law requires that an examiner “must show reasons that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would select the elements from the cited prior art references for combination in the manner cited.” (See *In re Rouffet*, 149 F. 3d 1350, 1359, 47 USPQ 2d 1453, 1459 (Fed. Cir. 1998) and also MPEP 2142 and 2145. Adequate findings of facts can come from several sources. *In re Dembiczak*, 175 F 3d. 994 (Fed. Cir. 1999). The motivation to combine reference must be found in the cited references themselves. *Id.* Alternatively, the Examiner may establish that one of ordinary skill in the art would have been motivated to combine the references with articulated findings of fact regarding: 1) the level of skill in the art, 2) the relationship between the fields of the cited art, and 3) the particular features of the prior art references that would motivate one of ordinary skill in Applicant’s particular art would select elements disclosed in references from a wholly different field. *Id.*

The combination of the “flexible substrate” and “plurality of blocks” or the combination of the “flexible substrate” and “plurality of different shaped blocks” cannot be obvious under 35 U.S.C. § 103(a). There is no reason that the skilled artisan, confronted with the same problems as the Applicant and with no knowledge of the invention as claimed in Claims 1 and 4-9, would have selected to combine these elements since neither the admitted prior art nor Izu disclosed,

suggested, taught, or motivated the use of blocks and/or different shaped blocks in combination with a flexible substrate. Further, one of ordinary skill in the art would have not been motivated to combine the admitted prior art and Izu to arrive to the combination of the blocks and/or different shaped blocks deposited in a flexible substrate since neither of the references even suggested a need for such combination. In addition, the plurality of different shaped blocks is fully supported by the specification. The term "shaped blocks" is not used to necessarily convey that the blocks must have any particular shape. Each of the blocks may be large or small and configured such that each will fit into the corresponding receptor. The term "plurality of different shaped blocks" is used to convey that each block is shaped and configured based on the corresponding receptors. In addition, each block is shaped and configured based on the circuitry residing on/in the block.

Contrary to the Examiner's belief, the combination of the admitted prior art and Izu could not teach, suggest, or even motivate the combination of a plurality of blocks being deposited in the substrate of a flexible display. The motivation to combine the admitted prior art and Izu are not found in the references themselves. The admitted prior art made no mention of the plurality of different shaped blocks deposited in a flexible substrate. The admitted prior art was not concerned with flexibility of the substrate. The admitted prior art did not even suggest a flexible substrate. Izu pertained with depositing films or layers on a flexible substrate and did not even suggest depositing blocks into the substrate. In particular, Izu discussed the desire of using a thin, continuous, and flexible substrate for the deposition of thin film electronic, metallic and semiconductor layers upon a continuous and flexible substrate. Nowhere in Izu was there as suggestion of depositing blocks or objects into a substrate that could be flexible. In addition, Izu



did not suggest differently blocks shaped to fit particular receptor sites of the substrate. Izu dealt with film deposition and not object deposition such as fluidic self-assembly (FSA).

A person of ordinary skill in the art would have not been motivated to combine the admitted prior art and Izu to derive to the combination as claimed in Claims 1 and 4-9. A person of ordinary skill in the art would have not looked to Izu to solve a problem of blocks deposition to form a display. Izu did not suggest the substitution of blocks for layers of material. As previously discussed, Izu dealt with film deposition and not object (such as blocks) deposition. It is thus unreasonable to expect that one of ordinary skill in the art would combine the admitted prior and Izu to get blocks to be deposited in a flexible substrate. Therefore, the motivation to combine the admitted prior art and Izu cannot be supported by the references.

Applicant further submits that depositing different shaped blocks on the flexible substrate is not common and known in the art to optimize device performance. In addition, neither the admitted prior art nor Izu suggested, motivated or taught the deposition of different shaped blocks on the flexible substrate. Thus, the combination of the admitted prior art and Izu would have not led to Applicant's Claims 1 and 4-9.

Furthermore, Applicant asserts that economic efficiency of combining blocks and a flexible substrate is not suggested, taught, or motivated by the admitted prior art or Izu, alone or in combination. Izu mentioned that it is cost efficiency that favors the continuous deposition layers upon a continuous, flexible substrate (see Izu, col. 2, lines 62-67). Such discussion, however, did not suggest, teach, or motivate that it would have been cost efficient to deposit blocks onto a flexible substrate, or alternatively, blocks of different shapes onto a flexible substrate as claimed in Claims 1 and 4-9. Cost efficiency in film deposition on a flexible substrate would have not led one of ordinary skill in the art to believe that it would have been

cost efficient to deposit blocks on a flexible substrate. Drawing such a conclusion would be an impermissible hindsight reasoning.

For the reason stated above, Claims 1 and 4-9 are patentable under 35 U.S.C. § 103(a) over the admitted prior art and in view of Izu.

II. Claims 23-27 are patentable under 35 U.S.C. § 103(a) over the admitted prior art and in view of Izu.

The subject matter of Claims 23-27 differs from the admitted prior art and Izu at least in that these claims include a plurality of blocks and a flexible substrate whereas the prior art cited does not teach, suggest, or motivate such combination.

Claims 23-27 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the admitted prior art and in view of Izu for the same reason that Claims 1 and 4-9 were rejected. The discussion for claims 1 and 4-9 is similarly applicable to Claims 23-27.

As previously discussed, Izu pertained to a flexible substrate having various layers deposited thereon. Izu did not deal with a plurality of blocks deposited therein. Additionally, neither Izu nor the admitted prior art taught the flexible substrate coupling to the passive display backplane and a plurality of blocks deposited in the flexible substrate. Thus, the combination of the admitted prior art and Izu cannot be interpreted to disclose the claimed element of Claims 23-27. It would not be obvious to modify either the admitted prior art or Izu to provide the missing element because neither of the references discussed the combination of a flexible substrate

coupled to the passive display backplane and a plurality of blocks deposited in the flexible substrate as in Claims 23-27.

Claims 23-27 are also patentable under 35 U.S.C. § 103(a) over the admitted prior art and in view of Izu for another reason. Specifically, as mentioned above, the combination of the admitted prior art and Izu did not teach, suggest, or even motivate the combination of a plurality of different shaped blocks being deposited in the substrate of a flexible display. The admitted prior art made no mention of the plurality of different shaped blocks. Izu pertained to a flexible substrate having various layers of films deposited thereon. Izu made no mention of the plurality of blocks much less different shaped blocks to be deposited in the substrate.

As neither Izu nor the admitted prior art, taught, suggested, or motivated depositing a plurality of different shaped blocks into a flexible substrate to create a flexible display, the combination of the references cannot be interpreted to disclose the claimed elements of Claims 23-27. It is also not obvious to modify either reference to provide the missing element because neither reference discussed the plurality of different shaped blocks being deposited in the substrate of a flexible display.

For the reasons stated above, Claims 23-27 are patentable under 35 U.S.C. § 103(a) over the admitted prior art and in view of Izu.

III. Claims 43, 45, 47, and 52 are patentable under 35 U.S.C. § 103(a) over the admitted prior art and in view of Izu.

The subject matter of Claims 43, 45, 47, and 52 differs from the admitted prior art and Izu at least in that these claims include a flexible substrate and a plurality of display device components coupled to the flexible substrate whereas the prior art cited does not teach, suggest, or motivate such combination. Furthermore, the prior art does not, even in combination, teach the first, second, and third lengths.

Claims 43, 45, 47, and 52 were rejected under 35 U.S.C. § 103(a) as being unpatentable over admitted prior art and in view of Izu. The Examiner stated that “forming plurality of display devices on a substrate is common and known in the art and thus would have been obvious to optimize device performance.”

As mentioned above, the law requires that an examiner “must show reasons that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would select the elements from the cited prior art references for combination in the manner cited.” (See *In re Rouffet*, 149 F. 3d 1350, 1359, 47 USPQ 2d 1453, 1459 (Fed. Cir. 1998) and also MPEP 2142 and 2145). The Examiner thus bears the burden of proving an obviousness type rejection based on findings of facts and not based on conclusive statements. (See *In re Dembiczak*, 175 F 3d. 994 (Fed. Cir. 1999)). Alternatively, the Examiner may establish that one of ordinary skill in the art would have been motivated to combine the references with articulated findings of fact regarding: 1) the level of skill in the art, 2) the relationship between the fields of the cited art, and 3) the particular features of the prior art references that would motivate one of ordinary skill in Applicant’s particular art would select elements disclosed in references from a wholly different field. *Id.*

The Examiner has done none of the above. The Examiner appears to use a hindsight reason for rejecting Claims 43, 45, 47, and 52. Thus, the combination of the “flexible substrate” and “plurality of display device components” cannot be obvious under 35 U.S.C. § 103(a).

The admitted prior art disclosed a rigid display and a rigid substrate. The admitted prior art made no mention of a plurality of *display device components* being coupled to a flexible substrate as claimed in Claims 43, 45, 47, and 52. Furthermore, the admitted prior art did not, even in combination, teach the first, second and third length that are required of Claims 43, 45, 47, and 52

Applicant further submits that the Examiner misunderstood the admitted prior art to have discussed a plurality of display device components. The Figures 1(a) to 1(d) discussed pertaining to the admitted prior art did not suggest, teach, or even hint at multiple display device components on the substrate. The figures showed several blocks incorporated into a rigid substrate. There was no suggestion that this rigid substrate will form a plurality of display device components.

Claims 43, 45, 47, and 52 can be illustrated, for example, by Figures 10 and 11 of the Application. Claim 43 is directed to a flexible substrate that may be continuous and upon which, a plurality of display device components (e.g., active matrix display devices) can be formed. Unlike Claims 43, 45, 47, and 52, the admitted prior art only dealt with a rigid substrate with a plurality of blocks to form one display. Thus, the admitted prior art did not suggest, teach, or even hint at multiple display device components formed on a substrate.

Moreover, Izu did not pertain to a flexible substrate whereupon a plurality of display device components (e.g., active matrix display devices) can be formed. Izu pertained to forming thin film devices such as photovoltaic cells, thin film transistor arrays, thin film displays, and

thin film memory arrays. There was no suggestion of forming display devices on what may be a continuous substrate. Instead, Izu pertained to forming layers of material on the substrate, which is not the same as forming display devices on the substrate.

Furthermore, neither the Izu reference, nor the admitted prior art, taught a flexible substrate having at least a first length; said flexible substrate having a second length; and a plurality of display device components coupled to said flexible substrate, each of said display device components is separated by at least a third length. The combination of the admitted prior art and Izu thus, cannot be interpreted to disclose the claimed elements of Claims 43, 45, 47, and 52. It would not be obvious to modify either reference to provide the missing element to provide Claims 43, 45, 47, and 52 because neither reference discussed the flexible substrate with a plurality of different display device components.

There is no reason that the skilled artisan, confronted with the same problems as the Applicant and with no knowledge of the invention as claimed in Claims 43, 45, 47, and 52, would have selected to combine these elements since neither the admitted prior art nor Izu disclosed, suggested, taught, or motivated the use of a plurality of display device components on a flexible substrate. The Examiner's statement "forming plurality of display devices on a substrate is common and known in the art and thus would have been obvious to make a large display using a plurality of displays" cannot be a finding of facts since it is not supported by any facts provided by the Examiner. Without such finding of facts, the Examiner's statement appears to be an impermissible hindsight reason to reject Claims 43, 45, 47, and 52 for obviousness.

For the reasons stated above, Claims 43, 45, 47, and 52 is patentable under 35 U.S.C. § 103(a) over the admitted prior art and in view of Izu.

IV. Claims 44, 46, and 48-51 are patentable under 35 U.S.C. § 103(a) over the admitted prior art and in view of Izu.

The subject matter of Claims 44, 46, and 48-51 differs from the admitted prior art and Izu at least in that these claims include a flexible substrate and a plurality of display device components coupled to the flexible substrate whereas the prior art cited does not teach, suggest, or motivate such combination. Furthermore, the prior art does not, even in combination, teach the first, second, and third lengths or that each of the display device components is assembled into a separate display device.

Claims 44, 46, and 48-51 were rejected under 35 U.S.C. § 103(a) as being unpatentable over admitted prior art and in view of Izu. The Examiner stated that “forming plurality of display devices on a substrate is common and known in the art and thus would have been obvious to optimize device performance.”

Similar to the discussion above, the Examiner appears to use a hindsight reason for rejecting Claims 44, 46, and 48-51. Thus, the combination of the “flexible substrate” and “plurality of display device components” cannot be obvious under 35 U.S.C. § 103(a).

The admitted prior art disclosed a rigid display and a rigid substrate. The admitted prior art made no mention of a plurality of *display device components* being coupled to a flexible substrate as claimed in Claims 44, 46, and 48-51. Furthermore, the admitted prior art did not, even in combination, teach the first, second and third length and that each display device

components is assembled into a separate display device that are required of Claims 44, 46, and 48-51

Applicant further submits that the Examiner misunderstood the admitted prior art to have discussed a plurality of display device components. The Figures 1(a) to 1(d) discussed pertaining to the admitted prior art did not suggest, teach, or even hint at multiple display device components on the substrate. The figures showed several blocks incorporated into a rigid substrate. There was no suggestion that this rigid substrate will form a plurality of display device components.

Claims 44, 46, and 48-51 can be illustrated, for example, by Figures 10 and 11 of the Application. Claim 44 is directed to a flexible substrate that may be continuous and upon which, a plurality of display device components (e.g., active matrix display devices) can be formed. Unlike Claims 44, 46, and 48-51, the admitted prior art only dealt with a rigid substrate with a plurality of blocks to form one display. Thus, the admitted prior art did not suggest, teach, or even hint at multiple display device components formed on a substrate.

Moreover, Izu did not pertain to a flexible substrate whereupon a plurality of display device components (e.g., active matrix display devices) can be formed. Izu pertained to forming thin film devices such as photovoltaic cells, thin film transistor arrays, thin film displays, and thin film memory arrays. There was no suggestion of forming display devices on what may be a continuous substrate. Instead, Izu pertained to forming layers of material on the substrate, which is not the same as forming display devices on the substrate.

Furthermore, neither the Izu reference, nor the admitted prior art, taught a flexible substrate having at least a first length; said flexible substrate having a second length; and a plurality of display device components coupled to said flexible substrate, each of said display



device components is separated by at least a third length. The combination of the admitted prior art and Izu thus, cannot be interpreted to disclose the claimed elements of Claims 44, 46, and 48-51. It would not be obvious to modify either reference to provide the missing element to provide Claims 44, 46, and 48-51 because neither reference discussed the flexible substrate with a plurality of different display device components.

There is no reason that the skilled artisan, confronted with the same problems as the Applicant and with no knowledge of the invention as claimed in Claims 44, 46, and 48-51, would have selected to combine these elements since neither the admitted prior art nor Izu disclosed, suggested, taught, or motivated the use of a plurality of display device components on a flexible substrate. The Examiner's statement "forming plurality of display devices on a substrate is common and know in the art and thus would have been obvious to make a large display using a plurality of displays" cannot be a finding of facts since it is not supported by any facts provided by the Examiner. Without such finding of facts, the Examiner's statement appears to be an impermissible hindsight reason to reject Claims 44, 46, and 48-51 for obviousness.

For the reasons stated above, Claims 44, 46, and 48-51 is patentable under 35 U.S.C. § 103(a) over the admitted prior art and in view of Izu.

V. Claims 55 and 57-62 are patentable under 35 U.S.C. § 103(a) over the admitted prior art and in view of Izu.

The subject matter of Claims 55 and 57-62 differs from the admitted prior art and Izu at least in that these claims include a plurality of blocks and a flexible substrate whereas the prior art cited does not teach, suggest, or motivate such combination.

The Examiner rejected Claims 55 and 57-62 under 35 U.S.C. § 103(a) as being unpatentable over the admitted prior art and in view of Izu for the same reason that Claims 1 and 4-9 were rejected. The discussion for Claims 1 and 4-9 is similarly applicable to Claims 55 and 57-62.

As previously discussed, Izu pertained to a flexible substrate having various layers deposited thereon. Izu did not deal with a plurality of blocks deposited therein. Additionally, neither Izu nor the admitted prior art taught the flexible substrate coupled to the passive display backplane and a plurality of blocks deposited in the flexible substrate. Thus, the combination of the admitted prior art and Izu cannot be interpreted to disclose the claimed element of Claims 55 and 57-62. It would not be obvious to modify either the admitted prior art or Izu to provide the missing element because neither of the references discussed the combination of a flexible substrate coupling to the passive display backplane and a plurality of blocks deposited in the flexible substrate as in Claims 55 and 57-62.

Claims 55 and 57-62 are also patentable under 35 U.S.C. § 103(a) over the admitted prior art and in view of Izu for an additional reason. Specifically, as mentioned above, the combination of the admitted prior art and Izu did not teach, suggest, or even motivate the combination of a plurality of different shaped blocks being deposited in the substrate of a flexible display. The admitted prior art made no mention of the plurality of different shaped blocks. Izu pertained to a flexible substrate having various layers of films deposited thereon. Izu

made no mention of the plurality of blocks, much less, a plurality of different shaped blocks to be deposited in the substrate.

As neither Izu nor the admitted prior art, taught, suggested, or motivated depositing a plurality of different shaped blocks into a flexible substrate or the polarizing film to create a flexible display, the combination of the references cannot be interpreted to disclose the claimed elements of Claims 55 and 57-62. It is also not obvious to modify either reference to provide the missing element because neither reference discussed the plurality of different shaped blocks being deposited in the substrate of a flexible display.

For the reasons stated above, Claims 55 and 57-62 are patentable under 35 U.S.C. § 103(a) over the admitted prior art and in view of Izu.

## **H. CONCLUSION**

For the reasons discussed above, Appellant contends that all pending claims are in condition for allowance. Appellant contends that the claims are patentable in light of the admitted prior art and in view of Yamada.

Therefore, Appellant respectfully prays for reversal of the Examiner's rejection.

**Fee for Filing a Brief in Support of Appeal**

Enclosed is a check in the amount of \$320.00 to cover the fee for filing a brief in support of an appeal as required under 37 C.F.R. 1.17(c) and 1.192(a).

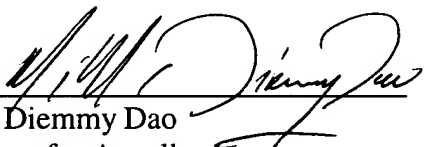
**Deposit Account Authorization**

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Appellant hereby requests such extension.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR  
& ZAFMAN LLP

Dated: September 23, 2003

  
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Signature

September 29, 2003

\_\_\_\_\_  
Date

## **APPENDIX A**

### **Pending claims as of the Examiner's decision mailed April 23, 2003**

1. (Previously presented) A flexible display device comprising:  
a flexible substrate; and  
an active matrix display backplane coupled to said substrate wherein said active matrix display backplane comprises a plurality of different shaped blocks that are deposited onto one of said flexible substrate and a polarizing film.
4. (Previously presented) The flexible display device as in claim 1 wherein said display device conforms to a desired shape of an object which is planar when said flexible display device is attached to said object.
5. (Previously presented) The flexible display device as in claim 1 wherein said display device conforms to a desired shape of an object which is non-planar when said flexible display device is attached to said object.
6. (Previously presented) The flexible display device as in claim 1 wherein each of said blocks comprises an active circuit element which drives a picture element.
7. (Previously presented) The flexible display device as in claim 1 further comprising:  
a display generation substrate coupled to said active matrix backplane.

8. (Original) The flexible display device as in claim 1 wherein said active matrix backplane comprises at least one electrode for each picture element.

9. (Original) The flexible display device as in claim 1 wherein said active matrix display is conformal.

23. (Previously presented) A flexible display device comprising:  
a flexible substrate;  
a passive matrix display backplane coupled to said flexible substrate; and  
said passive matrix display backplane comprises a plurality of different shaped blocks that are deposited onto said flexible substrate.

24. (Original) The flexible display device as in claim 23 wherein said display device conforms to a desired shape of an object which is planar when said flexible display device is attached to said object.

25. (Original) The flexible display device as in claim 23 wherein said display device conforms to a desired shape of an object which is non-planar when said flexible display device is attached to said object.

26. (Original) The flexible display device as in claim 23 wherein each of said blocks comprises a circuit element which drives a picture element.

27. (Original) The flexible display device as in claim 23 further comprising:  
a display generation substrate coupled to said passive matrix backplane.

43. (Original) A plurality of display device components comprising:  
a flexible substrate having at least a first length;  
said flexible substrate having a second length; and  
a plurality of display device components coupled to said flexible substrate, each of said display device components is separated by at least a third length.

44. (Original) The plurality of display device components as in claim 43 wherein each of said display device components is assembled into a separate display device.

45. (Original) The plurality of display device components as in claim 43 wherein each of said flexible display device components has a backplane comprising a plurality of shaped blocks which are deposited onto said flexible substrate.

46. (Original) The plurality of display device components as in claim 44 wherein said separate display device components conform to a desired shape of an object which is non-planar when said separate display device is attached to said object.

47. (Original) The plurality of display device components as in claim 45 wherein each of said shaped blocks comprises a circuit element which drives a picture element.

48. (Original) The plurality of display device components as in claim 44 wherein each of said display device components forms a separate display backplane and a display generation substrate is coupled to each said separate display backplane.

49. (Original) The display device as in claim 48 wherein each said separate display backplane comprises at least one electrode for each picture element.

50. (Original) The display device as in claim 48 wherein each said display separate display backplane is a passive matrix display backplane.

51. (Original) The display device as in claim 48 wherein each said display backplane is an active matrix display backplane.

52. (Original) The display device as in claim 43 wherein the second length of the substrate is continuous.

55. (Previously presented) A display device comprising:  
a flexible substrate; and  
a flexible reflective display backplane coupled to said flexible substrate wherein said flexible reflective display backplane comprises a plurality of shaped blocks which are deposited onto said flexible substrate.



57. (Previously presented) The display device as in claim 56 wherein said display device conforms to a desired shape of an object when said flexible display device is attached to said object.

58. (Previously presented) The flexible display device as in claim 56 wherein each of said shaped blocks comprises a circuit element which drives a picture element.

59. (Previously presented) The display device as in claim 56 further comprising: a display generation substrate coupled to said flexible reflective display backplane.

60. (Original) The display device as in claim 55 wherein said flexible reflective display backplane comprises at least one electrode for each picture element.

61. (Original) The display device as in claim 55 wherein said display is conformal.

62. (Original) The display device as in claim 55 wherein said substrate has at least one recessed region, said recessed region is reflective.